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DENISE REED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-12-00878-YGR
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO
v.)	CONTINUE HEARING DATE
)	
DENISE LASHAWN REED,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED by and between the parties hereto and their respective undersigned counsel, and with the consent of Defendant Denise Reed, that the hearing presently scheduled for July 18, 2013 at 2:00 p.m. be taken off calendar and rescheduled for September 5, 2013 at 2:00 p.m.. The reason for this extension is that the parties need additional time to finalize and confirm the terms and language of the proposed plea agreement. This proposed continuance also takes into account Defense Counsel's pre-planned vacation time. The parties do anticipate a change of plea at the next hearing date, which will constitute current Defense Counsel's second appearance before the Honorable Judge Yvonne Gonzalez Rogers in the present matter.

The Defense submits and the Government does not object that it is appropriate to exclude time from July 18, 2013 through September 5, 2013, for the purpose of effective preparation, and because the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

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1 The defense submits that it is further appropriate to exclude time for availability and
2 continuity of counsel, and because the ends of justice served by taking such action outweigh the best
3 interest of the public and the defendant in a speedy trial, taking into account the exercise for the
4 purpose of effective preparation. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

5 The United States does not object to such an exclusion.

6 **IT IS SO STIPULATED**

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8 DATED: July 16, 2013

By: /s/
Julia Mezhinsky Jayne
Counsel for Denise Reed

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11 DATED: July 16, 2013

UNITED STATES ATTORNEY'S OFFICE

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13 By: /s/
CYNTHIA STIER
Attorneys for Plaintiff
UNITED STATES OF AMERICA

14
15
16 **ORDER**

17 **IT IS SO ORDERED**

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19
20 DATED: July 16, 2013


HON. YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT COURT JUDGE